

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Mag. No. 10-MJ-71 (FLN)

In Re Search Warrants of February 23,
2010, and Later Days

**STEVEN RENNER'S MOTION FOR
RETURN OF PROPERTY UNDER
FED. R. CR. PRO. 41(g) AND OTHER
RELIEF**

Steven Mark Renner by his counsel, Felhaber, Larson, Fenlon & Vogt, P.A. and Jon M. Hopeman, hereby move the Court for the following relief:

1. Ordering the government to return to Steven Mark Renner and his companies all items seized by the government by means of search warrants executed at Mr. Renner's companies on February 23, 2010, and in subsequent days.
2. Ordering the government to return to Steven Mark Renner and his companies all funds seized by the government by means of seizure warrants executed upon Mr. Renner's bank accounts and upon the bank accounts of his companies on February 23, 2010 and in subsequent days. Mr. Renner and his companies seek return of all customer funds, employees funds, and funds belonging to the companies.
3. Ordering the government to return to Steven Mark Renner and his companies all attorney-client privileged items seized by the government by means of the search warrants executed at Mr. Renner's companies on February 23, 2010, and in subsequent days and barring review of the same by a "taint team."
4. Granting an evidentiary hearing.

5. Alternatively, appointing a Special Master and ordering preparation of a report to the court within 45 days on the question of whether there was a fraudulent scheme at Inter-Mark and whether monies should be returned to the business, its employees, and customers.

6. Referring to another federal agency for investigation the matter of the leak of the search warrant affidavit to the press, and ordering a report be prepared for the court and parties within 45 days.

7. Enjoining and restraining the government from informing witnesses, customers, and employees that Mr. Renner and his companies and employees were running a Ponzi scheme upon those customers and others, and from leaking confidential information to the press.

8. For such other relief as the Court deems just.

This motion is made upon Fed. R. Cr. Pro. 41(g) and upon the grounds stated in the attached declaration and memorandum of law.

Respectfully submitted,

Dated: March 25, 2010

FELHABER, LARSON, FENLON & VOGT, P.A.

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